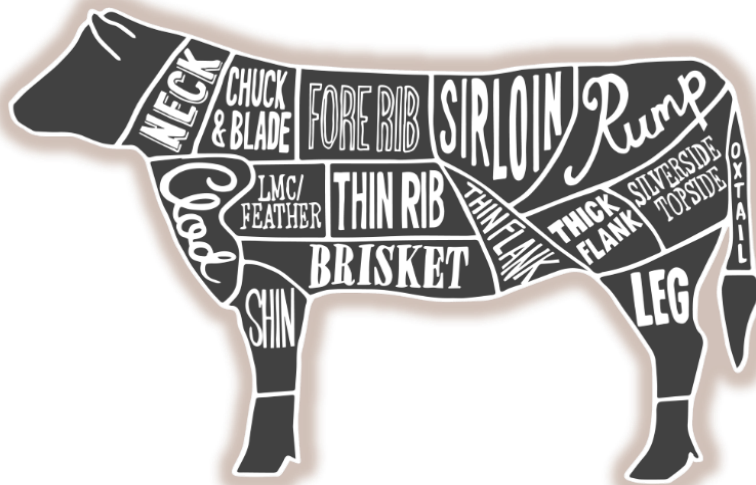




FY20 Annual Report

Meat and Poultry Inspection Bureau



Mission

Montana's Meat and Poultry Inspection Bureau mission is to ensure that meat and poultry slaughtered, processed, and stored within the state meet all state and federal requirements for wholesome and unadulterated products. This is accomplished through product and site inspections, licensing, product labeling and laboratory testing.

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FY20 Summarization Statement from Bureau Chief

Over the last fiscal year, the Meat and Poultry Inspection Bureau (MPI) has been focused on hiring quality inspection personnel and enhancing training for all inspectors. By the end of FY20, MPI was fully staffed with 24.5 FTEs. Having relief inspectors available to cover inspection assignments made it easier for other inspectors to take leave and the bureau has been able to cover inspections efficiently. We have been fortunate to hire several outstanding people to fill various roles in the bureau.

Once inspectors are hired, MPI has a responsibility to the inspector and to the industry to provide adequate training. Acquiring federal training is expensive and time consuming although the benefit is having the most up-to-date information available. In the past, very few bureau staff attended direct federal training primarily due to budget constraints and lack of relief inspection coverage. Throughout FY20, the MPI trainer developed and delivered a solid in-house training program. New inspectors are now trained for months rather than weeks. This has resulted in having well prepared inspectors when they are asked to inspect independently.

The COVID-19 pandemic changed the way training is delivered to state meat inspection programs. Traditionally, federal training programs required an inspector to travel out of state to attend courses that exceeded a month in duration. In late FY20, MPI took advantage of an opportunity provided by the United States Department of Agriculture's (USDA) Food Safety & Inspection Service (FSIS) that would allow inspectors to attend a comprehensive course called Inspection Methods virtually rather than in a classroom setting. Many states could not send inspectors to the traditional classroom setting because they did not have the means. The virtual course meant that state inspection programs could access the training without constraints such as budget and lack of establishment coverage. By the end of FY20, three inspection supervisors underwent training and passed a proctored, comprehensive examination.

As more virtual classes open, MPI will continue to nominate inspection staff to attend. The goal will be to put every inspector through the Virtual Inspection Methods course. Industry and consumers will benefit for years to come from having a consistently trained staff that can answer often complex questions based upon sound scientific principles.

Because inspection staff operate remotely, effective communication is a crucial part of day-to-day operations. Through the COVID-19 pandemic, Montana MPI honed its communication skills even more to conduct nearly all its work remotely. Although there are challenges, staff are successfully able to conduct training and meetings remotely. For example, weekly meetings are being held with inspectors to answer questions. These meetings have proven to be vital to improving the information delivered to the regulated industry.

In FY20, MPI undertook a major overhaul of administrative rules. The revised administrative rules for meat inspection were at times too complex and, in some areas, conflicted with federal rules. By eliminating rules that were unnecessarily restrictive, MPI significantly reduced the regulatory burden and confusion for industry members.

Every three years FSIS audits the state meat inspection program. These audits provide assurance to the USDA that Montana is carrying out its inspection duties at least equal to that of the USDA's inspection services. Although Montana was scheduled to have an on-site audit in April of 2020, the COVID-19 pandemic resulted in the audit being postponed until FY21.

In summary, in FY20, the Meat and Poultry Inspection Bureau increased its standard of excellence in many areas of the program by improving training, increasing staffing, and clarifying regulations. The Bureau is committed to continuing this trend. As we provide better regulation, Montana meat consumers will continue to benefit well into the future.

What the Future Holds

The Meat and Poultry Inspection Bureau looks forward to the next fiscal year and believes it will be a year of strong program growth. Although some business sectors have not fared well through the COVID-19 pandemic, the meat industry in Montana has seen strong demands from consumers. As those demands increase, so does the need for regulation.

Early in FY21, the Governor made the meat industry a priority by announcing a grant program designed to increase Montana's capacity for meat production. The grant program, administered by the Montana Department of Agriculture, will help recipients to increase storage capacity and assist with purchases of new buildings and equipment. According to the Department of Agriculture, there were 234 applicants with 105 of those applicants receiving grant funding. The total amount of grants awarded was \$12.2 million. Both new and existing businesses took advantage of the grant and are working toward enhancing the meat industry in Montana.

The bureau saw a strong surge in inquiries and inspection related questions shortly after the grant was announced. Staff spent a great deal of time answering questions and working with prospective new business owners to better understand the regulations that govern meat production. Based upon the level of interest the bureau was seeing, the demand for our services will be stronger than ever. The bureau is closely monitoring the demand to ensure there are adequate program resources.

Having worked over the last couple of years to develop a solid training program for inspectors, in FY21 the bureau will continue to push forward to find training opportunities for all inspectors. A well-trained staff is beneficial for the industry because we are able to provide accurate, consistent regulation across all districts in the state. The USDA has begun to conduct their Inspection Methods course in a virtual format. I will continue to nominate inspectors to attend this course until either all inspectors have had the opportunity to attend, or the virtual format is discontinued.

COVID-19 will likely continue to affect how we conduct business in FY21. Until the current health crisis has passed, staff will continue to minimize their time in-plant and limit contact with others through following recommended social distancing guidelines. In addition, we will continue to make inspection of new businesses a priority to help meet the Governor's goals for the meat industry.

The outlook for the next fiscal year is promising. Industry remains supportive of the program and its application of regulation. Through enhanced communication and regulatory decisions being made based upon the application of scientific principles, the regulators and those regulated will all play a role to produce safe, wholesome meat products for all consumers.

Authorization

According to section two of the Federal Meat Inspection Act, "Meat and meat food products are an important source of the nation's total supply of food. They are consumed throughout the nation and the major portion thereof moves in interstate or foreign commerce. It is essential in the public interest that the health and welfare of consumers be protected by assuring that meat and meat food products distributed to them are wholesome, not adulterated, and properly marked, labeled and packaged..."

The Montana Meat and Poultry Inspection Bureau operates in a manner similar to the other 26 states with a cooperative state meat inspection program. Montana carries out its own inspection services in a manner that is "at least equal to" inspection services provided by the United States Department of Agriculture (USDA),

as well as utilizing the federal Public Health Information System (PHIS) a web-based data driven system that utilizes role assignments and predictive analytics to collect, consolidate and analyze establishment data to generate and assign specific inspection tasks to improve food safety.

To help meet the federal “at least equal to” standard, Montana has adopted both federal law and rule. Under 81-9-219, Montana Code Annotated (MCA), Montana adopts the Federal Meat Inspection Act, the Federal Poultry Inspection Act, and the Federal Humane Methods of Slaughter Act. Each of these federal acts addresses various aspects of how the Montana program operates.

Further, Administrative Rules of Montana (ARM) 32.6.712 adopts Title 9 of the Code of Federal Regulations (CFR). These rules outline how Montana is to carry out its meat and poultry inspection program. In addition, Montana Meat and Poultry Inspection utilizes other laws and rules under Title 81 of MCA and Title 32 of ARM.

Administrative Rule Updates

An analysis of existing Administrative Rules of Montana (ARM) revealed that some rules conflicted with federal regulation and were burdensome making industry compliance difficult. During FY20, the Meat and Poultry Inspection Bureau (MPIB) proposed significant rule changes to address issues found with existing rules. The following is a summary of the ARM rule changes made during FY20:

32.6.701 – Defines a meat depot.

32.6.702 – Clarifies that no license is required from the Department of Livestock if licensed and inspected by a local health authority.

32.6.712 – Updated the adoption of the Code of Federal Regulations by reference.

32.6.713 – This is a new rule that describes the conditions under which a meat depot can operate.

32.6.714 – This is a new rule requiring restroom facilities within meat plants.

32.6.703 through 32.6.711 were repealed to reduce regulatory burden on the industry.

32.6.801 through 32.6.815 were repealed to reduce regulatory burden on the industry.

The MPIB will continue to evaluate existing administrative rules, streamline processes, and make it easier for businesses to comply with meat regulations

Organization and Funding

The Meat and Poultry Bureau operates on an annual budget of approximately \$1.7 million which consists of 50% federal funding and 50% state general fund. The program has 24 FTE (full time employee) positions.

Montana Meat and Poultry Inspection Bureau was organized into three main units during this fiscal year – administration, inspection, and audit units.

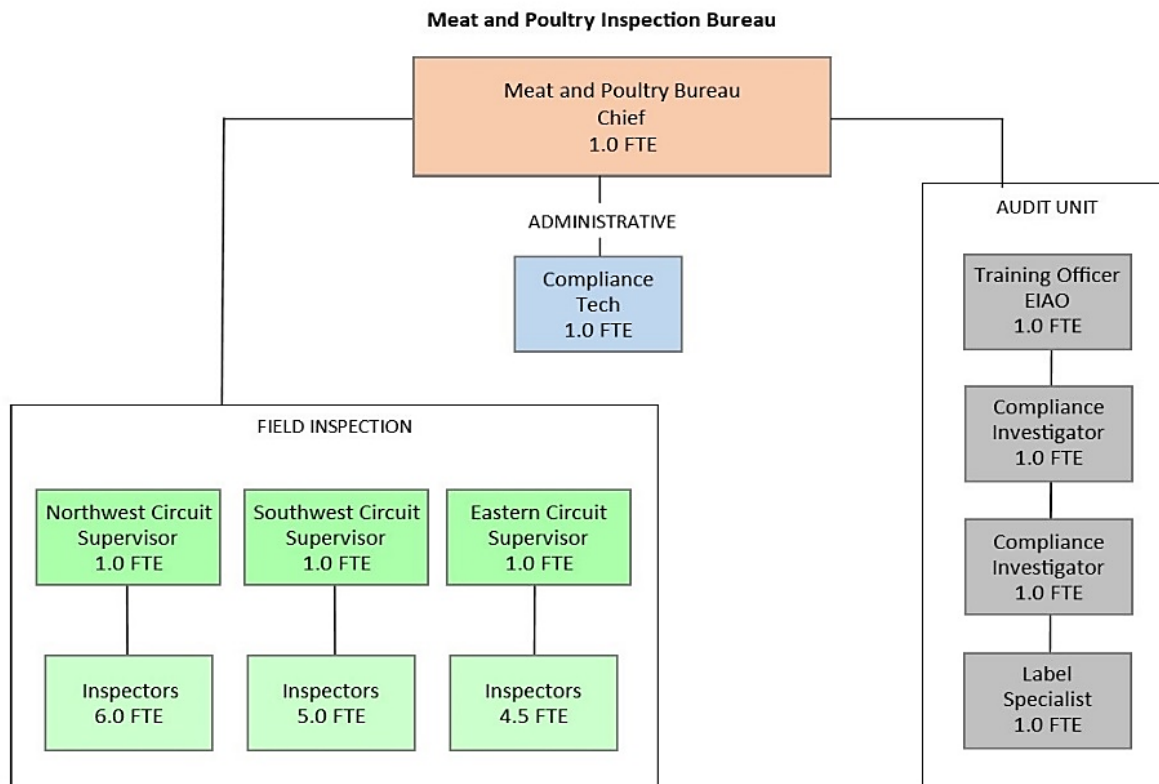


Figure 1: Meat and Poultry Inspection Bureau Organizational Chart

Administrative Unit

The Program Administration Unit provides program oversight, strategic planning, performance management, program licensing, and database management. This unit is responsible for assuring administrative requirements of FSIS are met.

The compliance tech issues licenses and renewals annually using the LIVAPPS data software system. All slaughter records and meat and poultry products poundage are also entered into LIVAPPS and compiled for

quarterly statistical reporting. Headcount data is also compiled and reported to Montana Agricultural Statistics and FSIS each quarter.

All inspection staff must obtain and maintain clearance to the secure federal Public Health Information System (PHIS) for recording inspection duties. The clearance process as well as issuing of all USDA issued equipment is handled by the administrative unit assuring all inspectors can receive proper clearance and USDA LincPass identity cards as required. The compliance tech serves the roles of Grant Curator, Role Management Analyst, and User Administrator for Montana in PHIS maintaining inspection staff assignments and establishment information.

The administrative unit is responsible for invoicing establishments for fees incurred for any overtime, holiday or weekend inspection service as well as charges for inspection services for any species “non-amenable” to the Federal Meat Inspection Act (i.e. bison, elk, alpaca, etc.) as required by regulation are billed monthly. Fees are tracked and reported to FSIS.

See **Appendix 1** for Licenses

Microbiological Testing

Montana’s inspection program conducts product sampling for detecting pathogens in meat and poultry products. The Administrative Unit compliance tech monitors that inspection staff follows proper guidelines for sampling frequencies for each product produced.

In FY20 the Montana program worked with the Montana Public Health Laboratory to test for a variety of pathogens such as *Salmonella*, *E. coli* O157:H7, six major non-O157 shiga toxin producing *E. coli* (STECs), and *Listeria Monocytogenes*. The Bureau also works with Montana State University animal science laboratory for water activity readings. Inspection staff conduct residue sampling for both the National Residue Program and local kidney swab testing (KIS) for residue testing of show animals or any animal that may be suspected of recent injection. There are also testing requirements for fat content and moisture protein levels in certain products.

In the federal fiscal year ending September 30, meat and poultry inspectors will collect approximately 200 raw beef samples and 150 ready-to-eat product samples for testing. Montana also tests raw ground bison meat intended for sale during the last fiscal year. The office staff keeps records of when and where the samples were taken and monitors the results should any further actions or further testing be required. Montana’s sampling program is a critical component for assuring that products produced under inspection are safe for consumers.

Inspection Unit

District Supervisors

The image below represents the three supervisory circuits in Montana: Northwest, Southwest and Eastern.

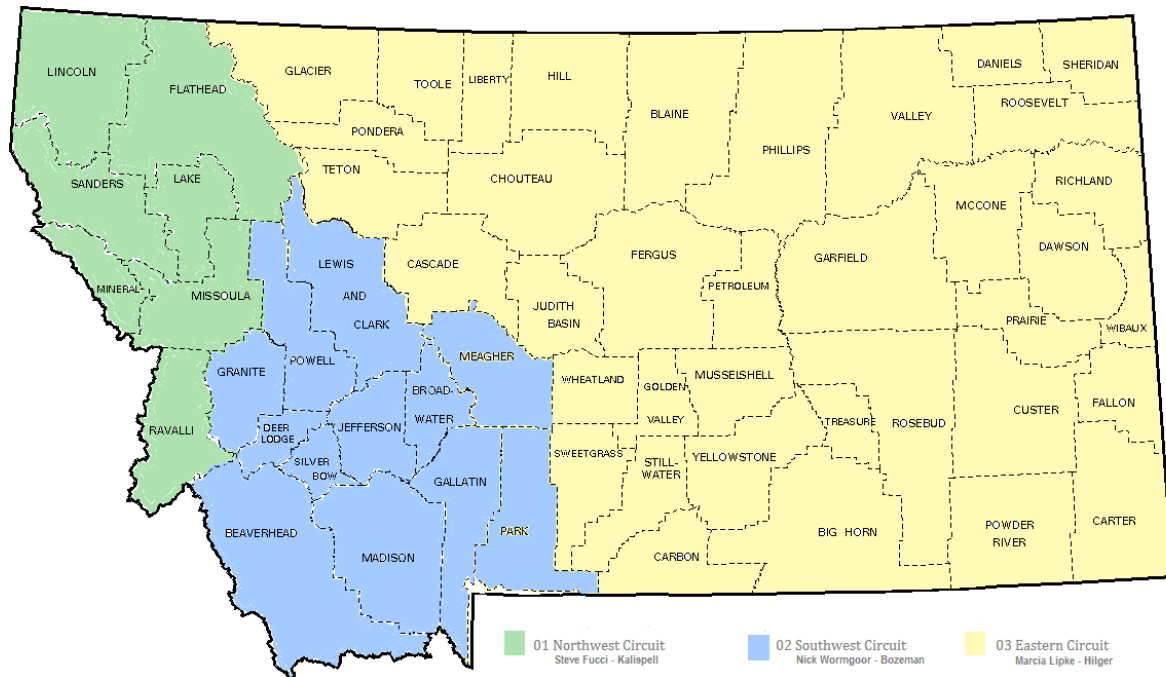


Figure 2: Meat and Poultry Inspection Bureau map of supervisory circuits. Eastern Montana counties with lower populations and no inspected establishments allow large area coverage.

The 3 circuit supervisors are responsible for local meat inspection staff in their district to assure establishments are being provided inspection services as granted. They assure that field inspectors are completing their job duties as assigned, approve time and schedules, and complete job performance appraisals as required. Supervisors provide both slaughter and processing relief inspection as necessary. In addition, they monitor their district staffs' tasks and establishment information in PHIS.

Inspector supervisors work with businesses applying for inspection services. They use their knowledge of hazard analysis and HACCP plans to assure both inspection staff and plant personnel are following regulations. Supervisors travel many miles to conduct onsite plant reviews throughout the year, assist staff at plants, provide inspection coverage when necessary.

In June 2020 the supervisors all attended the FSIS Inspection Methods training course. This year the two-week course was offered online saving the program all travel and lodging expense. Along with the EIAO, the 3 district supervisors may also provide training to the field inspectors. Training covers all aspects of livestock slaughter, including human handling requirements, and critical control points in production of products produced under state inspection. Staff must also keep up with general computer software updates as well as their functions in the PHIS system.

Inspection Unit – continued

Field Inspectors

Montana MPI inspectors carry out day to day inspection of livestock and poultry products at officially inspected establishments. Those same inspectors also inspect all custom exempt operations and meat storage units throughout the year. As of the end of FY20 this included 34 officially inspected establishments, 117 custom exempt operations, and 162 meat storage units.

An inspector must be onsite during slaughter operations. Animal carcasses and organs exhibiting questionable conditions or disease symptoms are retained for final disposition by a veterinarian under contract with the agency for their services. All slaughter operations are done under the sanitation guidelines required by USDA and establishments must adhere to strict humane handling regulations.

Inspectors also oversee the processing of meat and poultry products. Personnel are trained in food safety Hazard Analysis Critical Control Points (HACCP) and necessary recording of data. All products produced under inspection must follow a HACCP plan and staff must document hazard analysis steps, critical control points and all record keeping in the PHIS to assure the proper steps and processes are followed. They provide pre-operational inspection to verify sanitation procedures are met at the start of each process and/or day. Documenting daily duties can be extensive and time consuming. These records are available for inspection by supervisors and FSIS at any time.

Inspectors also check for correct labeling of products, including review of ingredients and net weights; assure the mark of inspection is used properly; look for any safety hazards or sanitation concerns in the production area; and conduct meetings with plant management regarding various subjects and regulations.

Montana MPI inspection staff are required to keep up on all FSIS Notices and Directives issued by USDA as guidance on the application of regulation. Staff must determine which regulation is applicable to an establishment.

Montana Meat and Poultry Inspection staff also oversee custom exempt facilities. These facilities may only slaughter and process product for use by the owner, members of his household, and non-paying guests. Products from custom operations may not be resold and must be marked “not for sale”. Like officially inspected establishments, custom exempt facilities are required to meet and follow all sanitation guidelines. Although not subject to animal by animal inspection, facility inspections of custom exempt operations are conducted no less than twice per year. Meat and/or poultry storage sites are reviewed once per year.

See **Appendix 2** for FY20 inspected livestock slaughter headcounts

See **Appendix 3** for FY20 custom exempt livestock slaughter headcounts

See **Appendix 4** for FY20 state inspected product poundage

Audit Unit

The Audit Unit consists of an Enforcement, Investigations and Analysis Officer (EIAO), a label specialist, and two compliance investigators. These functions are focused on regulations that govern outside the in-plant inspection process.

The EIAO is part of the staff required to meet the “at least equal to” obligations for state meat inspection programs. To qualify, the EIAO attended an intensive four-week classroom training session provided by USDA FSIS, as well as the two-week Inspection Methods course. The EIAO has several job duties including conducting food safety assessments (FSAs), providing outreach to Montana meat producers, and participating in recall activities. In addition, the EIAO provides training for the bureau staff, oversees the audit unit, and serves as the technical expert on regulations pertaining to meat and poultry. In FY20 this position served as an instructor for the state’s HACCP training course held annually thru Montana State University.

Food Safety Assessments

The main responsibility of the EIAO is to conduct a Food Safety Assessment (FSA). FSAs are comprehensive reviews of an establishment’s food safety systems including the hazard analysis, HACCP plan, sanitation, microbiological testing, plant production practices, and any other practices and procedures that impact food safety. During an FSA, the EIAO spends several days in the official establishments reviewing written documentation as well as observing all aspects of slaughter and product production. In establishment’s that produce ready-to-eat products, the EIAO also collects samples for *Listeria monocytogenes* testing.

The EIAO makes enforcement recommendations based on the findings of the FSA. FSAs are entered into the Public Health Information System as part of the permanent record for each establishment.

Labeling

The labeling specialist ensures that meat and poultry products are properly labeled and are following labeling regulations. The label specialist conducts label audits to ensure that all ingredients in meat products are correct and current. The label specialist attended a training course for processing and labeling food products in FY20 as well as provided a mandatory online training session for field inspectors.

Part of the Meat and Poultry Inspection Bureau’s inspection services includes assisting local producers with labeling issues. Proper labeling contains important consumer information such as product identification, net weights, ingredients, and allergens. Labels must also bear the state mark of inspection and be approved by the bureau’s labeling specialist. The label specialist visits state inspected establishments annually and audit labels to assure products are being marketed to consumers with correct information. Approximately 45 new labels were approved for use in FY20 for state inspected establishments.

This position also provides relief inspection.

Compliance

Montana Meat and Poultry Inspection has two compliance investigators who travel around the state ensuring retail establishments that deal in meat and poultry products are following both state and federal laws.

Compliance staff may also investigate consumer complaints, ensure adulterated and misbranded product are removed from commerce, and investigate the sales of meat or poultry outside the regulatory framework. They also provide outreach and education to the public. In FY20 investigators worked on education of food banks and meat product donations, and began work with poultry producers on available exemptions and record keeping.

Compliance investigators travel statewide to assure local meat supply is unadulterated and labeled properly. They work in partnership with the USDA compliance officer based out of the Port of Sweet Grass.

Staff and Districts

Administrative Unit Staff

Bureau Chief, Helena – [Gary Hamel, Helena HQ](#)

Compliance Tech, Helena – [Bonnie Marceau, Helena HQ](#)

Inspection Unit Staff

District Supervisors

Circuit 01: Northwest district supervisor – [Stephen Fucci, Columbia Falls](#)

Supervises 6 inspectors

Circuit 02: Southwest district supervisor – [Nick Wormgoor, Belgrade](#)

Supervises 5 inspectors

Circuit 03: Eastern district supervisor – [Marcia Lipke, Hilger](#)

Supervises 5 inspectors

Staff and Districts, Inspection Unit Staff continued

State Meat & Poultry Inspectors

The image below reflects the bureau's fourteen inspection regions

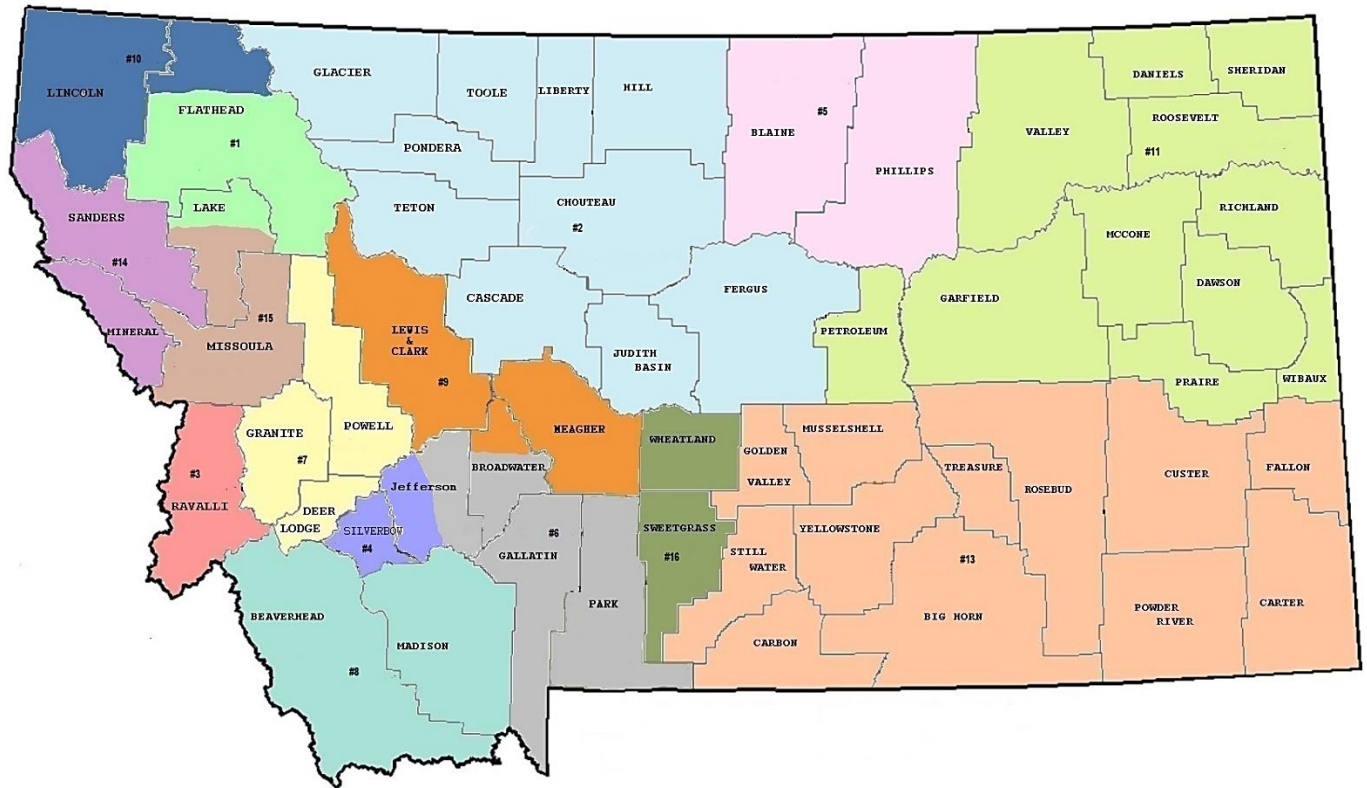


Figure 3: Inspector regions

State Meat & Poultry Inspectors

Region 1:	Lance Parsley, Kalispell
Region 2:	Vanessa Thompson, Great Falls
Region 3:	Jennifer Alm Meinzen, Lolo
Region 4:	Lori Mulcahy, Butte
Region 5:	Kathi Molyneaux, Chinook
Region 6:	Don Holwegner, Manhattan
Region 7:	Lorin Blom, Anaconda

Staff and Districts, Inspection Unit Staff continued

<i>Region 8:</i>	<i>Kal Fogel, Dillon</i>
<i>Region 9/Relief:</i>	<i>Austin Hoopes, Helena</i>
<i>Region 10:</i>	<i>Andrew DeLeon, Kalispell</i>
<i>Region 11:</i>	<i>Rom Hedges, Antelope</i>
<i>Region 13:</i>	<i>Lorri Hammond, Billings</i>
<i>Region 14:</i>	<i>Kayla Papesh, Superior</i>
<i>Region 15:</i>	<i>John Elmore, Missoula</i>
<i>Region 16/Relief:</i>	<i>Steve Buchanan, Big Timber</i>
<i>Relief:</i>	<i>Caleb Bagnell, Missoula</i>

Audit Unit Staff

Enforcement, Investigations and Analysis Officer (EIAO), Helena – *Dr. Emily Kaleczyz, Helena HQ*

Label Specialist / Relief Inspection, Helena – *Samantha Darlington, Helena HQ*

Compliance Investigators -

James Peterson, Bozeman
Ben Schmidt, Columbia Falls

Appendix 1 - Licenses

334 licensed facilities. License numbers in each supervisory circuit:

Circuit 01 – Northwest & Western Montana

State Inspected Plants:	13
Custom Exempt Facilities:	15
Meat Depot Storage Units:	51

Circuit 02 – Southwest & Central Montana

State Inspected Plants:	12
Custom Exempt Facilities:	18
Meat Depot Storage Units:	48

Circuit 03 – Eastern & Northcentral Montana

State Inspected Plants:	8
Custom Exempt Facilities:	90
Meat Depot Storage Units:	79

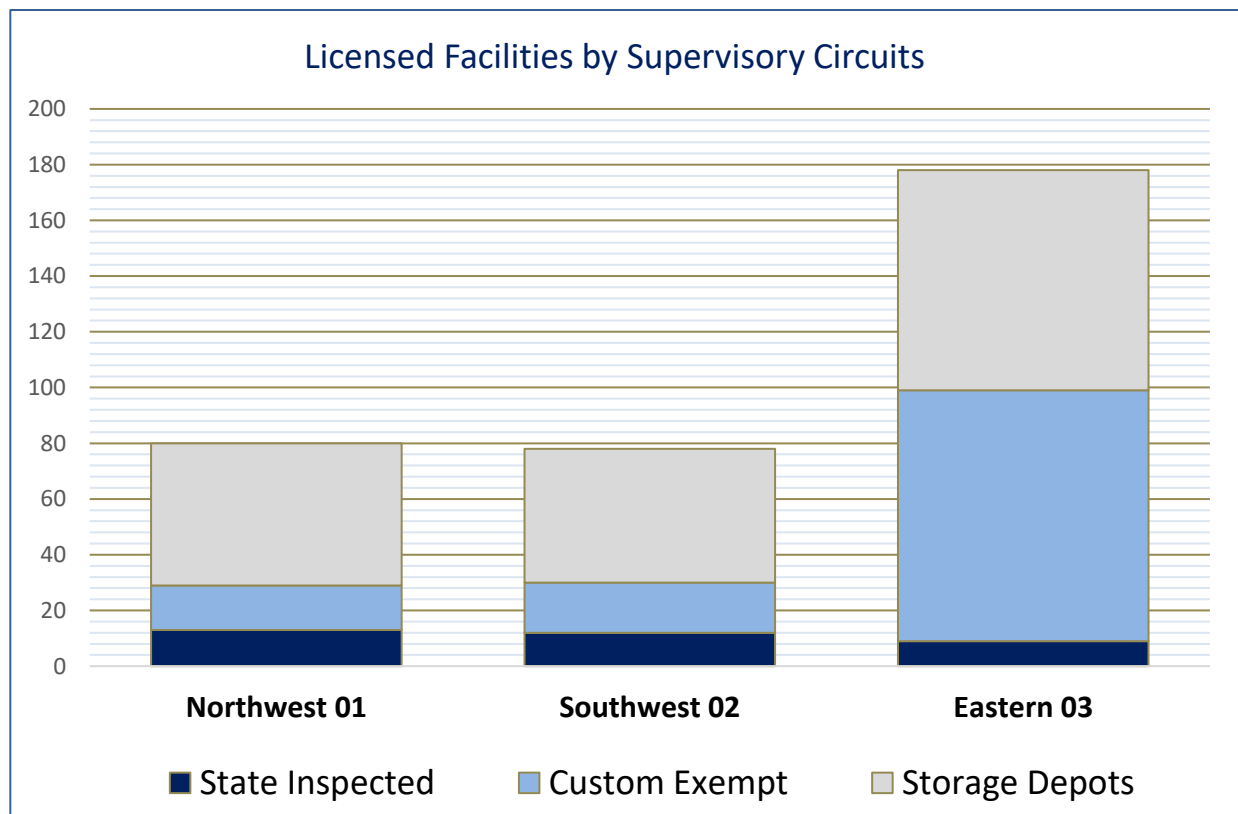


Figure 4: License Types by Supervisory Circuits

APPENDIX 2 - FY20 State Inspected Slaughter

State Inspected – Livestock slaughter headcounts

FY20 Slaughter Headcounts														
Animal Code	Animal Type	Jul	Aug	Sep	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun	Totals
0101	Steer	312	307	327	315	176	238	260	205	238	252	277	289	3196
0102	Heifer	104	74	86	112	60	117	130	87	115	159	132	145	1321
0103	Beef Cow	72	64	65	81	65	60	105	57	85	132	136	177	1099
0104	Dairy Cow	0	0	0	0	0	0	0	3	0	0	0	0	3
0105	Bull	24	18	15	17	12	22	19	24	28	48	50	45	322
1601	Bob Veal	0	0	0	0	0	0	0	0	0	0	0	0	0
1604	Heavy Calf	0	0	0	0	0	0	0	0	0	0	0	0	0
0202	Market Swine	663	778	550	473	345	330	321	295	381	579	567	855	6137
0203	Sow	13	9	15	13	10	8	7	14	22	17	14	10	152
0204	Boar	0	0	0	2	0	0	1	1	0	0	0	0	4
0301	Lamb	57	168	95	100	43	92	91	38	96	92	99	89	1060
0302	Sheep	77	57	65	82	92	43	70	38	68	22	38	30	682
0401	Goat	22	3	8	6	15	3	4	3	2	1	5	13	85
0601	Chicken	3067	1563	1186	1536	1912	1278	1258	0	1144	1433	2622	1418	18417
0702	Turkey	15	0	27	3113	334	0	0	0	952	0	0	1065	5506
0801	Duck	0	0	0	0	0	0	0	0	0	0	0	0	0
0901	Goose	0	0	0	0	0	0	0	0	0	0	0	0	0
1199	Ratite	333	0	0	0	0	0	0	0	0	0	0	0	333
1301	Rabbit	0	17	16	38	24	20	0	0	0	0	8	24	147
1403	Elk	5	0	6	45	0	24	0	0	0	0	2	0	82
1404	Bison	6	8	5	12	4	4	11	13	9	6	2	2	82
1499	Other Voluntary	0	51	0	10	0	4	15	15	5	4	12	6	122

Table 1: FY20 State Inspected slaughter headcounts

APPENDIX 2 - FY20 State Inspected Slaughter continued

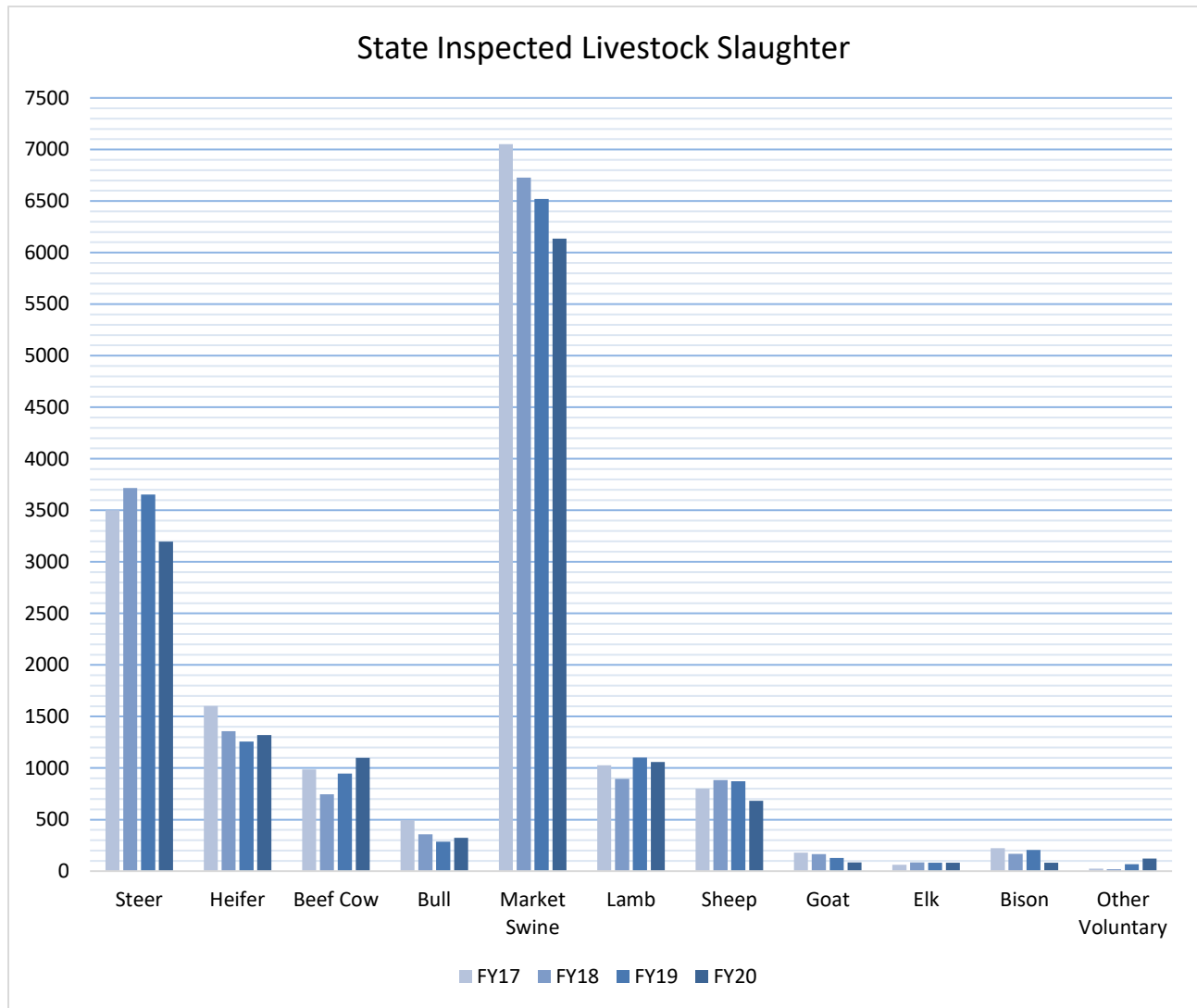


Figure 5: Four year comparison of inspected livestock slaughter

APPENDIX 2 - FY20 State Inspected Slaughter continued

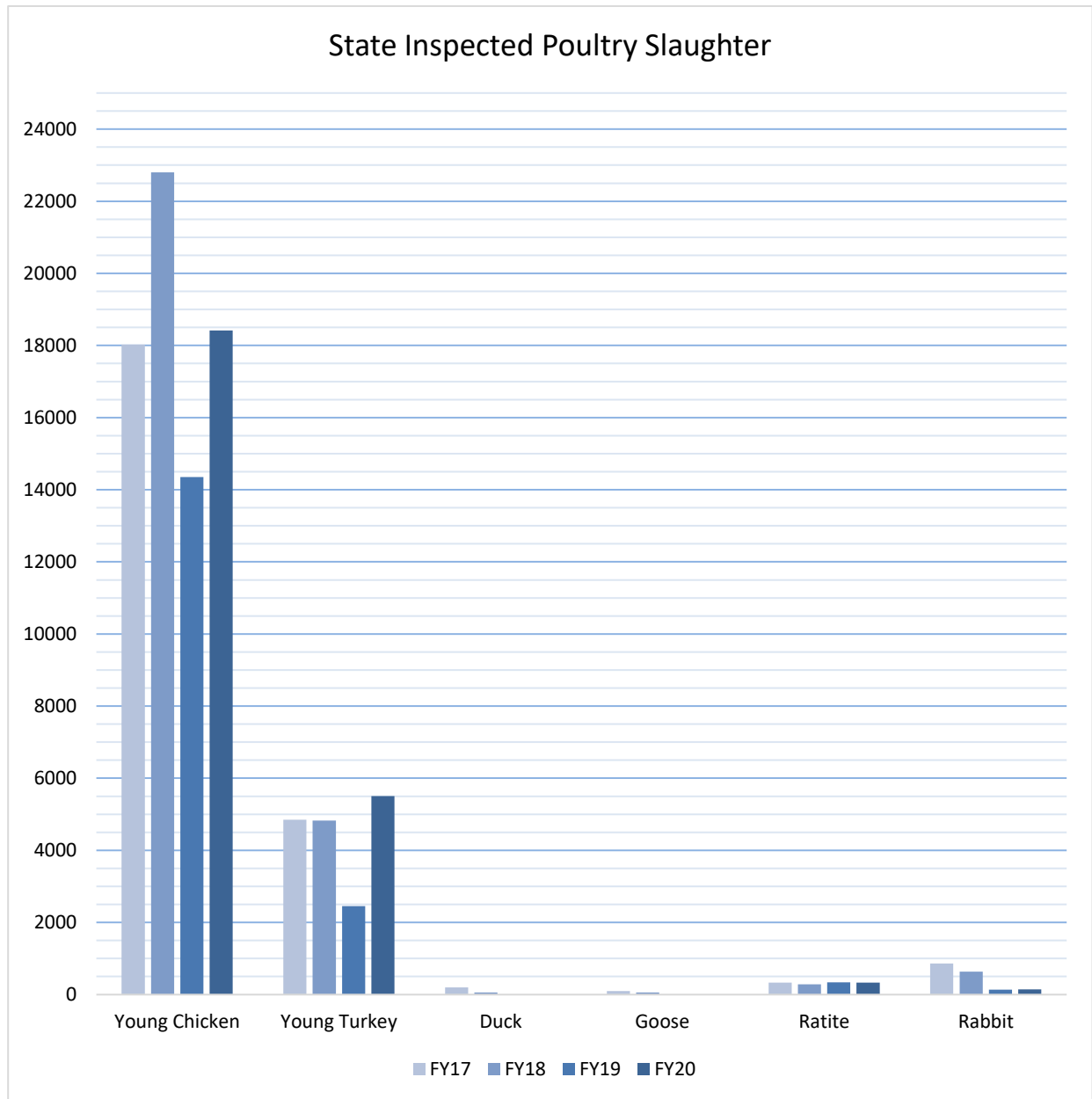


Figure 6: Four year comparison of inspected poultry slaughter

APPENDIX 3 - FY20 Custom Exempt Slaughter

Custom Exempt – Livestock slaughtered headcounts

Note: Due to Covid-19 safety and travel restrictions custom exempt slaughter data for current fiscal year was not gathered by end of the period and is averaged based on previous years.

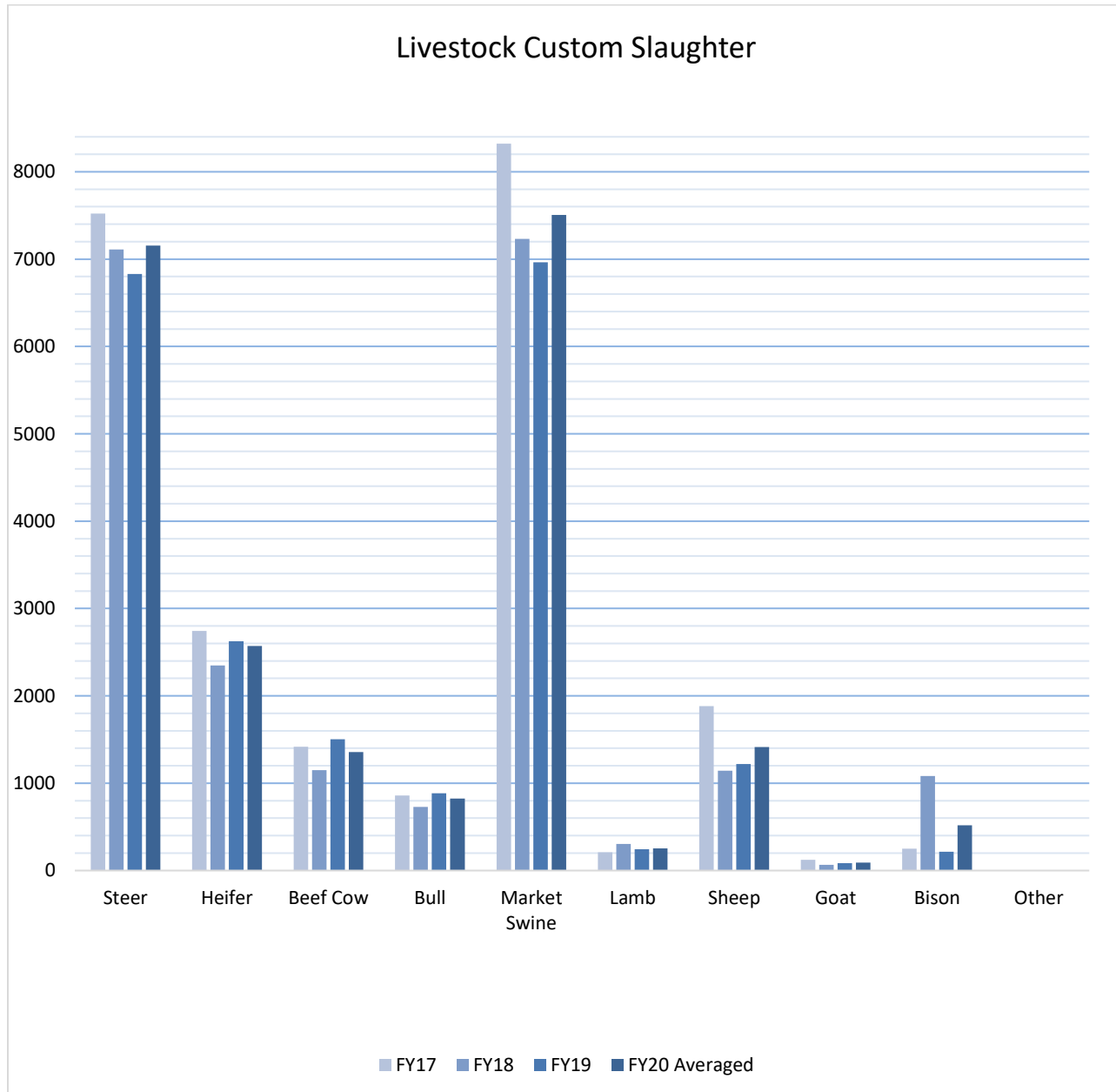


Figure 7: Four year comparison of custom exempt slaughtered livestock

APPENDIX 3 - FY20 Custom Exempt Slaughter continued

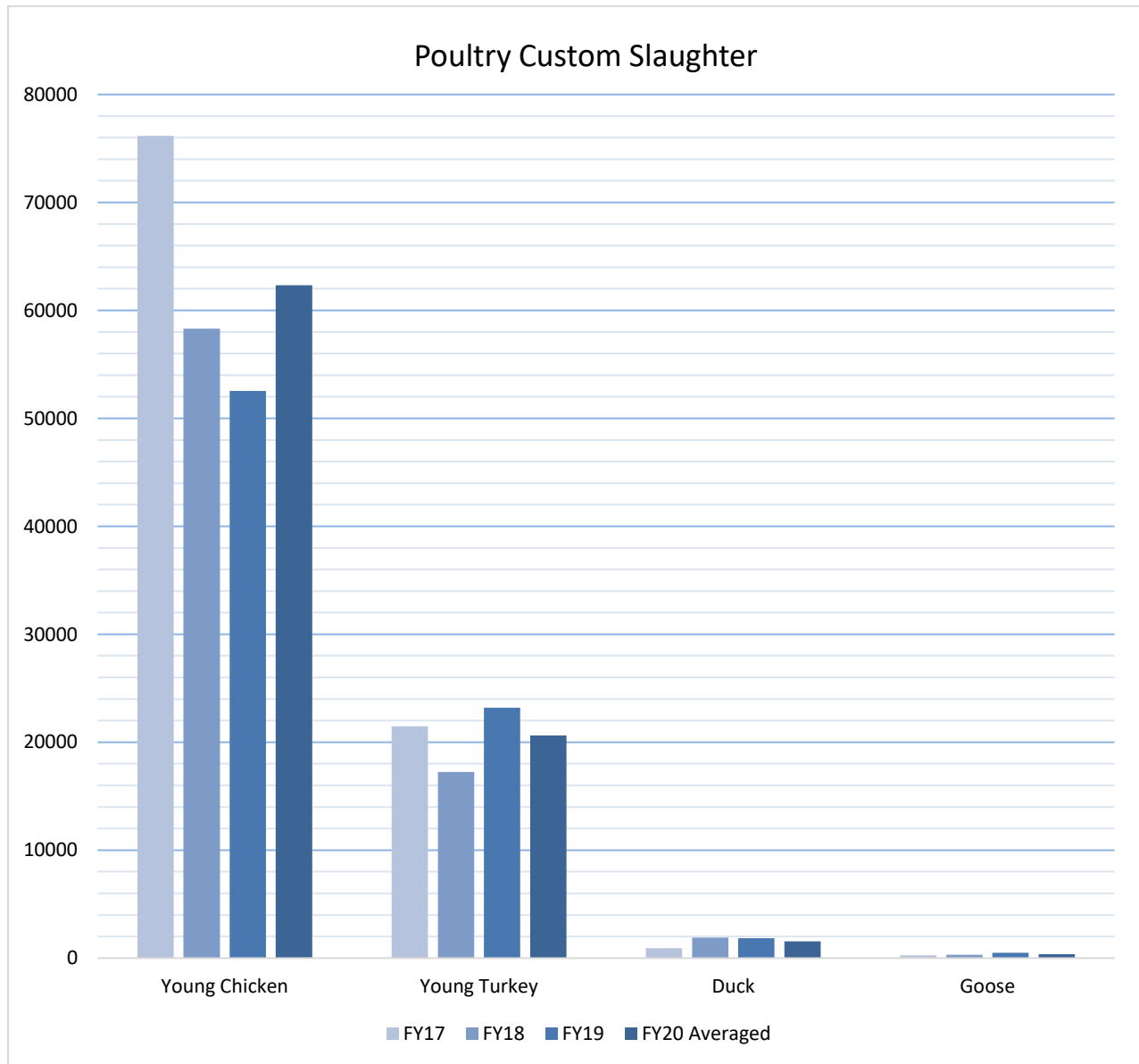


Figure 8: Four year comparison of custom exempt slaughtered poultry

Appendix 4 – FY20 Inspected Product Poundage Produced

Products produced under inspection services are tracked by the HACCP categories outlined in CFR 417.2. They include:

- *Raw Ground* – raw product that is put through a grinding process; like ground beef and ground pork
- *Raw Not Ground* – product that is not ground and intact; like carcass halves & quarters, cuts (bone-in or boned), primals & sub-primals (steaks, chops)
- *Not Heat Treated Shelf Stable* – product is acidified/fermented processed without heat/cooking
- *Heat Treated Shelf Stable* – product is processed with heat and/or drying until shelf stable, like jerky and snack sticks
- *Fully Cooked Not Shelf Stable* – products that are brought up to required cooking temperatures but not shelf stable, like some hams and sausages
- *Heat Treated Not Fully Cooked Not Shelf Stable* – products are processed with heat but not fully cooked and therefore not shelf stable, like bacon, sausages, or even some pasties and burritos.

FY20 State Inspected Product Poundage by Category

MEAT	1st	2nd	3rd	4th	Total Poundage
03B Raw Ground	248670	258813	193134	392066	1,092,683
03C Raw Not Ground	433420	403102	403360	1085204	2,325,086
03E Not Heat Treated Shelf Stable	0	1720	928	656	3,304
03F Heat Treated - SS	22182	20183	16734	21560	80,659
03G Fully Cooked - Not SS	89450	76325	90678	111349	367,802
03H Heat Treated - Not Fully Cooked - Not SS	46846	47565	26238	40754	161,403
POULTRY	1st	2nd	3rd	4th	Total Poundage
03B Raw Ground	4000	0	200	3150	7,350
03C Raw Not Ground	34386	77346	32626	4197	148,555
03E Not Heat Treated Shelf Stable	0	0	0	0	0
03F Heat Treated - SS	0	0	0	0	0
03G Fully Cooked - Not SS	15072	9984	12934	13785	51,775
03H Heat Treated - Not Fully Cooked - Not SS	240	0	1920	240	2,400

Table 2: State inspected meat and poultry products produced by HACCP category each quarter in FY20